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THE CITY OF NEW YORK
LAW DEPARTMENT
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NEW YORK, NY 10007

November 12, 2024

BY ECF

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York

**APPLICATION GRANTED
SO ORDERED**

Re: Ryan Paige v. City of New York, et al.
21 Civ. 11104 (JGK)

[Signature]
John G. Koeltl, U.S.D.J.
11/13/24

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Kevin Major, Gregg Albaum, Jonathan Santos, and Edward Reyes ("City defendants") in the above-referenced matter. The City defendants write to respectfully request an eleven (11) day extension of time for the City defendants to submit their motion for summary judgment, and corresponding extensions of time for the plaintiff to submit his opposition, and for the City defendants to submit their reply. Plaintiff consents to this request. This is the City defendants' third such request, the first two of which were granted by the Court. *See* Dkt. No. 76, Letter Motion, September 16, 2024; Dkt. No. 77, Order, September 17, 2024; Dkt. No. 80, Letter Motion, October 10, 2024; Dkt. No. 81, Order, October 11, 2024. This request does not affect any other Court deadlines.

The City defendants respectfully propose the following new briefing schedule for the City defendants' motion for summary judgment:

| Deadline: | Original Deadline: | Newly Proposed Deadline: |
|---|---------------------------|---------------------------------|
| Deadline for City Defendants' Motion for Summary Judgment | November 15, 2024 | November 26, 2024 |
| Deadline for Plaintiff's Opposition | December 13, 2024 | December 27, 2024 |
| Deadline for City Defendants' Reply | January 4, 2025 | January 15, 2025 |

The City defendants request this extension due to the schedule of the undersigned, who was out of the office from November 4, 2024 through until today, November 12, 2024, and has been busy with deadlines for motion practice in unrelated matters.

For the foregoing reasons, the City defendants respectfully request, with plaintiff's consent, an eleven (11) day extension of time for the City defendants to submit their motion for summary judgment, and corresponding extensions of time for the plaintiff to submit his opposition, and for the City defendants to submit their reply.

The City defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/ Gregory J.O. Accarino
Gregory J.O. Accarino
Senior Counsel
Special Federal Litigation Division

cc: By ECF
Sameer Nath
Attorney for Plaintiff